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February 23, 2005

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

**Re: *The Use of N11 Codes and Other Abbreviated Dialing Arrangements, CC*
Docket No. 92-105**

Dear Ms. Dortch:

Today, Josh Swift, Doug Sullivan, Gary Sacra and the undersigned of Verizon met with Regina Brown, Cheryl Callahan, Sanford Williams, Marilyn Jones and Narda Jones of the Wireline Competition Bureau to discuss the above proceeding. The attached handout was used during the meeting. All issues discussed are consistent with Verizon's position on the record. Please let me know if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Ann D. Berkowitz".

cc: Narda Jones
Regina Brown
Cheryl Callahan
Marilyn Jones
Sanford Williams

Verizon DIG NPRM Ex Parte

February 23, 2005

- The Pipeline Safety Improvement Act (Public Law 107-355) provides for the establishment of a 3-digit nationwide toll-free telephone number system to be used by State One-Call Notification Centers.

Proposed Alternatives



- 10-digit toll free number, e.g., 888-DIG-SAFE
- N11 code, e.g., 811
- 3-digit Easily Recognizable Code, e.g., 344

10-Digit Toll Free Number Solution



- “Quickest, least expensive and most effective” solution, according to NANC
 - ◆ No switch translations
 - ◆ Lower transaction cost
- Easy-to-remember nationwide mnemonic, e.g., 888-DIG-SAFE
- Already deployed in ME, MA, NH, RI, and VT
- Plentiful numbering resource
- Same solution for all carriers

- Scarce numbering resource
- Last available N11 code not reserved or in use
- Existing uses of 811 must be cleared
- 12-month lead time to implement
- But acceptable as an interim solution, until PSIA amended to allow 10-digit solution

344 Solution



- Not a viable solution
- Labor intensive and costly to implement
- Not all switch types support, e.g., Lucent GTD-5
- Minimum 1-3 years to implement
- Precludes use of 344 as an NPA
- Inter-digit timing required in 344 NXX areas

- Estimated costs range from \$1.5 - 3.5 million, depending on solution selected
- Carriers will incur implementation costs, including:
 - ◆ Switch and database translations
 - ◆ Billing system changes
 - ◆ Provisioning and maintenance systems changes
 - ◆ Development costs
- NANC endorses cost recovery for carriers

- 10-digit mnemonic toll-free number, e.g., 888-DIG-SAFE, is the best solution
- But 811 is acceptable as an interim solution
- 811 will require 12 months to implement
- Carriers must be allowed to recover costs
- Inconsistent state requirements should be precluded